## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN INVESTIGATION INTO THE TRAFFIC	)
DISPUTE BETWEEN WINDSTREAM	)
KENTUCKY EAST, LLC, BRANDENBURG	) CASE NO. 2008-00203
TELEPHONE COMPANY AND MCIMETRO	)
ACCESS TRANSMISSION SERVICES, LLC	)
D/B/A VERIZON ACCESS	)

## COMMISSION STAFF'S SECOND DATA REQUEST TO WINDSTREAM KENTUCKY EAST, LLC

Windstream Kentucky East, LLC ("Windstream"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 5 copies of the following information, with a copy to each party of record. The information requested herein is due on or before September 15, 2008. Responses to requests for information shall be appropriately bound, tabbed and indexed.

Each response shall be under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Windstream shall make timely amendment to any prior responses if it obtains information which indicates that the responses were incorrect when made or, though correct when made, are now incorrect in any material respect. For any requests to which Windstream fails to furnish all or part of the requested information, it shall provide

a written explanation of the specific grounds for its failure to completely and precisely

respond.

Careful attention should be given to copied material to ensure that it is legible.

When the requested information has been previously provided in this proceeding in the

requested format, reference may be made to the specific location of that information in

responding to this request.

Has Windstream submitted any bills to Brandenburg Telephone Company 1.

for the disputed traffic?

If the answer to the above question is no, explain why Windstream has not 2.

submitted any bills.

3. If Windstream has submitted bills for the disputed traffic to Brandenburg

Telephone Company, provide copies of the bills and/or invoices, as well as the billing

and payment history for the disputed traffic.

Stephanie Stumbo

**Executive Director** 

Public Service Commission

P.O. Box 615

Frankfort, Kentucky 40602

DATED: September 3, 2008